

IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE
FOR THE MIDDLE DISTRICT
NASHVILLE DIVISION

JANE DOE,)
)
Plaintiff,)
)
v.) No. 3:20-CV-01023
) Jury Demand
THE METROPOLITAN) Judge Trauger
GOVERNMENT OF NASHVILLE AND) Magistrate Judge
DAVIDSON COUNTY, TENNESSEE) Holmes
AND DR. ADRIENNE BATTLE) Lead Case
)
Defendants.)

DR. LILY MORENO LEFFLER,
Plaintiff,

v.
THE METROPOLITAN
GOVERNMENT OF NASHVILLE AND
DAVIDSON COUNTY, TENNESSEE,
AND DR. ADRIENNE BATTLE
Defendants.

DR. JAMES BAILEY,
DR. PIPPA MERIWETHER, and
DR. DAMON CATHEY,
Plaintiffs,

v.
METROPOLITAN GOVERNMENT
OF NASHVILLE AND DAVIDSON
COUNTY, TENNESSEE and
DR. ADRIENNE BATTLE,
Defendants.

The Deposition of: RENITA PERRY
April 12, 2022

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1 The deposition of Renita Perry was taken by
2 counsel for the Plaintiffs, by notice, via remote
3 means, in Nashville, Tennessee, on April 12, 2022,
4 pursuant to the provisions of the Federal Rules of
5 Civil Procedure.

6 All formalities as to notice, caption,
7 certificate, reading and signing of the deposition
8 are not waived. All objections, except as to the
9 form of the questions, are reserved to the hearing.

10 -----
11
12 APPEARANCES:

13 For the Plaintiffs:

14 Dr. James Bailey
15 Dr. Lily Leffler
16 Dr. Pippa Meriwether
17 Jane Doe

18 Ann Buntin Steiner
19 Attorney at Law
20 Steiner & Steiner, LLC
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24 For the Plaintiff:

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EXHIBITS

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1 RENITA PERRY,
2 called as a witness and, having been first duly
3 sworn, was deposed as follows:

4 EXAMINATION BY MS. STEINER:

5 Q. Would you please state your name for the
6 record?

7 A. Renita Forbes Perry.

8 Q. That's F-O-R-B-E-S?

9 A. Yes.

10 Q. Ms. Perry, what is your home address?

11 A. [REDACTED], Nashville,
12 Tennessee 37221.

13 Q. Ms. Perry, it's my understanding that you
14 currently work for Metro Nashville Public Schools;
15 is that correct? Did you hear me?

16 A. Yes.

17 Q. What is your position?

18 A. Executive officer of innovation.

19 Q. How long have you had that position?

20 A. So I'm in the interim. I've had it since
21 January 2022.

22 Q. Who had that job before you?

23 A. Thank you. Say it again. I couldn't hear
24 you.

25 Q. Who had that job before you?

1 A. Oh. This was -- so our chief of
2 innovation retired.

3 Q. And who was that?

4 A. Dr. Sharon Griffin.

5 Q. And do you keep up with Dr. Griffin?

6 A. Not as much as I should.

7 Q. Do you know her phone number, her cell
8 number?

9 A. Yes.

10 Q. What is it?

11 A. I don't have my cell phone.

12 Q. When we break --

13 A. Yes -- hold on. I have it. I'm sorry.

14 Q. What is her cell number?

15 A. [REDACTED].

16 Q. Is that her personal cell?

17 A. I assume so. That's the only number I
18 have for her.

19 Q. Thank you. When was the last time you
20 talked to Dr. Griffin?

21 A. In January right when she announced that
22 she was retiring.

23 Q. And how is she doing?

24 A. You know, at that time, she was still very
25 sick.

1 Q. What was wrong; do you know?

2 A. I have no idea.

3 Q. Do you know if it was cancer or if it was

4 --

5 A. I didn't ask.

6 Q. How do you know she is very sick?

7 A. She said she was very sick and she wasn't
8 doing well, so I didn't pry.

9 Q. But she did not take medical leave, she
10 retired from Metro schools?

11 A. She was on FMLA.

12 Q. Do you know if she is still on FMLA?

13 A. She retired.

14 Q. Did she take FMLA and then retire, or do
15 you know?

16 A. I don't know.

17 Q. The last time she was at Metro schools was
18 in the fall of 2021, correct?

19 A. Yes.

20 Q. Okay. And then she announced her
21 retirement, I assume, sometime in the fall, correct?

22 A. No.

23 Q. When did she announce it?

24 A. January 2022.

25 Q. And have you talked to Dr. Griffin at all

1 about this case?

2 A. No.

3 Q. My name is Ann Steiner, and I represent
4 four of the plaintiffs who have sued for
5 retaliation. I represent (name spoken off record),
6 who we are going to call Jane Doe. Is that okay
7 with you?

8 A. Yes.

9 Q. So any time I say Jane Doe, you'll know
10 I'm talking about (name spoken off record), correct?

11 A. Yes.

12 Q. Do you know who Jane Doe is?

13 A. I know that she was in a position, but
14 other than that, I don't know her.

15 Q. I also represent Dr. Pippa Meriwether.

16 A. Okay.

17 Q. Dr. Lily Leffler and Dr. James Bailey.
18 And Jesse Harbison is here today, too, and she
19 represents Dr. Damon Cathey.

20 A. Okay.

21 Q. We're going to ask you a whole bunch of
22 questions, and if you could answer them to the best
23 of your ability, and you can go back and explain, if
24 you want to add something later, feel free to do so,
25 if you need to take a break, feel free to do so.

1 A. Okay.

2 Q. Remember, I'm not an educator, so I can
3 ask some confusing questions, and if I do, stop me
4 and say I don't understand your question and I'll
5 try to rephrase it. But remember I don't understand
6 this field, so I'm going to be asking you some basic
7 questions.

8 A. Okay.

9 Q. If you could explain them to the best of
10 your ability to somebody that does not understand
11 your field, that would be great, okay?

12 Now, the only thing I'm really going to
13 stop you on is -- and I'll stop everybody, not just
14 you, it's going to be everybody, and I may not have
15 to, but sometimes when it's a yes or no response and
16 you nod or shake your head, I know exactly what you
17 mean and everybody else does, but the court reporter
18 cannot take that down, okay?

19 A. Yes.

20 Q. So I'll stop you then and I'll say, do you
21 mean a yes or do you mean no, and I'm not trying to
22 be rude, I just want to make the record clear, okay?

23 A. Yes.

24 Q. Now, have you ever given a deposition
25 before?

1 A. No.

2 Q. Have you ever been involved in a lawsuit
3 before?

4 A. No.

5 Q. Did you apply for the position of
6 executive officer of innovation?

7 A. No, because Dr. Griffin retired and so
8 they needed a replacement to complete the year.

9 Q. And so are you the interim executive
10 officer?

11 A. Interim, yes. But prior to that position,
12 I was the executive director of schools.

13 Q. Is that position, executive officer of
14 innovation, is that going to be an open position for
15 the next school year?

16 A. We don't know, because we do not know the
17 structure that the district is going in.

18 Q. Who took over your position as executive
19 director?

20 A. I am still in that role.

21 Q. Okay. So you're an executive director and
22 executive officer of innovation?

23 A. Yes.

24 Q. Did you get an increase in pay?

25 A. Yes.

1 Q. What is your current pay?

2 A. 155,000.

3 Q. What was your pay when you were the
4 executive director last fall?

5 A. 121,000.

6 Q. Now, from 2019, 2020 school year through
7 the 2020, '21 school year, did you get any increase
8 in pay?

9 A. No.

10 Q. Did you get that 3 percent cost of living
11 increase?

12 A. I'm not sure.

13 Q. Did you get any cost of living increases
14 that you know of?

15 A. I'm not sure.

16 Q. So you could have gotten them, you just
17 didn't pay that much attention, correct?

18 A. Exactly. It wasn't probably enough to
19 make me go, wow. No, I didn't pay any attention.

20 Q. Tell me a little bit about yourself.
21 Where are you from?

22 A. Jackson, Tennessee.

23 Q. Okay. Where did you go to college?

24 A. Union University.

25 Q. In Jackson?

1 A. Yes.

2 Q. What was your major?

3 A. Education and English as a second major.

4 Q. And did you have any other degrees?

5 A. Yes.

6 Q. What?

7 A. University of Memphis, master's of policy
8 and studies, education specialist, curriculum and
9 instruction, and I'm currently pursuing my
10 doctorate.

11 Q. Where are you getting your doctorate from?

12 A. Union University.

13 Q. Is that online?

14 A. I'm riding currently.

15 Q. Is your family still down in Jackson?

16 A. Yes.

17 Q. Okay. So when you were riding here, I
18 assume that you actually go down to Jackson to meet
19 with your professors?

20 A. Either online, on the phone, in-person,
21 yes.

22 Q. When did you get your degree from Union
23 University, undergraduate degree? When did you get
24 your undergraduate degree?

25 A. 2002.

1 Q. And when did you get your master's from
2 Memphis? Memphis State, correct?

3 A. University of Memphis.

4 Q. University of Memphis.

5 A. 2007.

6 Q. University of Memphis, did it go by
7 another name?

8 A. Memphis State.

9 Q. Okay. And when do you think you will
10 obtain your PhD?

11 A. This summer.

12 Q. Congratulations.

13 A. Thank you.

14 Q. Now, tell me about your work experience
15 when you graduated from Union, where did you go?

16 A. I was a teacher in Memphis. I was -- got
17 into leadership program, and I did a residency for a
18 year, and then I was an assistant principal, and
19 then I was a principal.

20 Q. In Memphis?

21 A. In Memphis and in Houston, Texas.

22 Q. Where did you work in Houston, Texas?

23 A. At a middle school.

24 Q. What was it called?

25 A. Crispus Attucks Middle School.

1 Q. Public school?

2 A. Yes.

3 Q. And you were the principal?

4 A. Yes.

5 Q. What years?

6 A. 2015 to 2018.

7 Q. Before you got to Memphis, you were the
8 principal down in Memphis in the Memphis school
9 system, correct?

10 A. I was principal there. I took -- yes.

11 Q. That's a public school system?

12 A. Yes.

13 Q. Okay. Now, and then you left Texas, where
14 did you go?

15 A. Came to Nashville.

16 Q. Where did you go work here?

17 A. I was a coordinator of instructional
18 support within the schools of innovation office.

19 Q. And that's the department you're executive
20 officer over now, correct?

21 A. Yes, ma'am.

22 Q. And how long did you have that job?

23 A. One year.

24 Q. Then what did you do?

25 A. I became the executive director.

1 Q. What was your title as executive director?

2 A. Executive director.

3 Q. What schools were you executive director
4 over?

5 A. Nine middle and high schools.

6 Q. You had White's Creek, correct?

7 A. Yes.

8 Q. And are you currently the executive
9 director over those nine middle and high schools?

10 A. No.

11 Q. What are you doing now?

12 A. I have nine elementary that I directly
13 supervise, and then as the executive officer of
14 innovation, I oversee the entire schools of
15 innovation and magnet schools.

16 Q. Does magnet schools, does that include
17 Stanford?

18 A. No.

19 Q. What is Stanford?

20 A. I don't know.

21 Q. Have you heard of Stanford grade school?

22 A. No, ma'am.

23 Q. It's a Montessori school.

24 A. I don't know.

25 Q. Does Metro schools have Montessori

1 schools?

2 A. Yes.

3 Q. Do you know if those are difficult to get
4 into?

5 A. I don't know.

6 Q. Now, in the year -- you became an
7 executive director in the fall of 2019, correct?

8 A. Yes.

9 Q. Okay. And in the fall of 2020, you stayed
10 an executive director correct?

11 A. Yes.

12 Q. And what schools were you over in the
13 school year 2020 through 2021?

14 A. That would be last year, correct?

15 Q. Yes.

16 A. Nine elementary schools.

17 Q. Do you know who took over White's Creek in
18 that year?

19 A. Yes.

20 Q. Who?

21 A. Dr. Brian Mells.

22 Q. No. As executive director.

23 A. Oh, yes. Dr. Chae Snorten.

24 Q. Was she an executive director for the
25 2019, 2020 school year?

1 A. Yes.

2 Q. So then do you know where she was in the
3 2019, 2020 school year?

4 A. No.

5 Q. Okay. When you were an executive director
6 in the 2019, 2020 school year, did you go into the
7 schools?

8 A. Yes.

9 Q. And did you try to go into the schools in
10 the 2019 school year as much as you could?

11 A. 2019, 2020 school year, yes, up until we
12 were out for COVID.

13 Q. COVID changed a lot, didn't it?

14 A. Yes.

15 Q. Now, was Tracy McPherson an executive
16 director in the 2019, 2020 school year?

17 A. So I have to think about the years. Yes.
18 Yes, she was.

19 Q. Do you know what happened to her for the
20 2020, 2021 school year, did she retire?

21 A. I'm not sure.

22 Q. Do you know what happened, was Susan
23 Cochran an executive director in the 2019, 2020
24 school year?

25 A. Yes.

1 Q. Do you know what happened to Ms. Cochran
2 for 2020, 2021 school year?

3 A. I'm not sure.

4 Q. Did you hear that either one of these two,
5 Ms. McPherson or Ms. Cochran retired?

6 A. I don't want to misspeak. I just don't
7 remember.

8 Q. Did you know Robin Shumate?

9 A. Yes.

10 Q. Do you have any idea why she was not an
11 executive director 2020 through 2021 school year?

12 A. No.

13 Q. In the system when you're referring to the
14 school years, such as 2019, 2020, or 2020, 2021, how
15 did you refer to them, because that's a handful to
16 have to go through all the years. How do you do it
17 in the system?

18 A. People do it a variety of ways. Some
19 people do fiscal year, some people do 2019-2020,
20 2020-2021, '21-'22.

21 Q. Okay. Now, did your job duties change as
22 an executive director from 2019, 2020 to the 2020,
23 2021 school year, other than having different
24 schools that you were the executive director of?

25 A. So, yes. Hello?

1 Q. Yes. How?

2 A. I'm sorry. So I work in the schools of
3 innovation and the schools of innovation schools are
4 very different from schools outside of the schools
5 of innovation. Our schools -- so the executive
6 director in schools of innovation does a bit more
7 than the regular executive directors. It can. We
8 have a lot more pressure.

9 Q. So then if you had stayed on as the
10 executive director over the nine middle and high
11 schools that you had, would your job have stayed
12 about the same?

13 A. Staying within the schools of innovation?

14 Q. No. In the 2019, 2020 school year, it's
15 my understanding that you were the executive
16 director over nine high schools and elementary
17 schools, correct?

18 A. No.

19 Q. What was it?

20 A. Nine middle and high, so seven middle, two
21 high schools.

22 Q. And if you had stayed the executive
23 director over those seven middle and the two high
24 schools, would your job have changed?

25 A. It would have increased in the amount of

1 work, so, yes.

2 Q. How?

3 A. So it would increase the number of
4 walk-throughs that we had done. We increased the
5 number of how we interact with our principals. We
6 have different requirements from the State that we
7 have to abide by, so our job does change.

8 Q. What were the different requirements that
9 the State put on you?

10 A. So for all intents and purposes, that was
11 the year that we -- that the State list comes out
12 which intensifies the work that we do.

13 Q. So you're saying that in the 2020 through
14 2021 school year, the State gave you a list of --

15 A. Go ahead.

16 Q. You're shaking your head no, so I'm going
17 to stop. Did the State give you any sort of a list
18 of what you were supposed to do for that year?

19 A. So what we have is we have our plan, and
20 in that plan, there are things that we have to do.
21 So I don't have that plan in front of me, but that
22 plan, there are different things that we do that we
23 turn in to the State that are above and beyond what
24 the district offers or requires, so as part of the
25 executive director, we are responsible for

1 implementing that plan.

2 Q. What were your job duties that the State
3 made you do that you did not have to do the year
4 before?

5 A. So I would say the year before, it just
6 intensified. So for example, the -- I also lead,
7 not just the principals, I also lead a small team, a
8 small team of instructional specialists. I lead a
9 small team of also non-academic specialists.

10 Q. You didn't lead that small team in 2019,
11 2020?

12 A. So we had that team in 2019, 2020, it
13 increased in 2020, 2021.

14 Q. Increased in terms of people?

15 A. Yes.

16 Q. So you hired additional specialists?

17 A. We had additional positions.

18 Q. And how many additional positions did you
19 have?

20 A. I had two new ones.

21 Q. Was that because you were in a school of
22 innovation or is that across the board to all
23 executive directors?

24 A. Because I was in the schools of
25 innovation.

1 Q. For the other executive directors, did
2 they have an increase in the number of specialists?

3 A. They are not specialists.

4 Q. Okay. So for the plan that you had to do
5 that was additional with regard to this specialist
6 that the State required you to do, that was because
7 you were moved into the school of innovation,
8 correct?

9 A. I've always been in the schools of
10 innovation. Each year the plan changes.

11 Q. Okay. But you were an executive director
12 in 2019, 2020 for two high schools and seven middle
13 schools, correct?

14 A. Yes. They were --

15 Q. Okay. Schools of innovation?

16 A. Yes.

17 Q. So White's Creek was a school of
18 innovation?

19 A. Yes.

20 Q. Okay. And now you're still in the schools
21 of innovation?

22 A. Yes.

23 Q. Okay. How many executive directors in
24 2019, 2020 were in the schools of innovation?

25 A. Three.

1 Q. Who were they?

2 A. Tracy McPherson, myself, Dr. Madeline
3 Gibbs.

4 Q. Ms. Gibbs stayed an executive director,
5 correct?

6 A. Yes.

7 Q. Did she stay at the same location?

8 A. Within the schools of innovation?

9 Q. Yes.

10 A. No.

11 Q. Where did she go?

12 A. She is an executive director of schools,
13 elementary.

14 Q. What did she do in 2019, 2020?

15 A. She was the executive director of
16 elementary and support within schools of innovation.

17 Q. And she is currently still today within
18 the schools of innovation, correct?

19 A. No.

20 Q. She's out of schools of innovation now?

21 A. Yes.

22 Q. Who is taking her place in the schools of
23 innovation?

24 A. Dr. Chae Snorten.

25 Q. You took Ms. McPherson's place, correct?

1 A. Yes.

2 Q. Who took your place?

3 A. Dr. Lendozia Edwards.

4 Q. So is Dr. Edwards in the school of
5 innovation?

6 A. Say that again.

7 Q. Is Dr. Edwards in the school of
8 innovation?

9 A. Is she in the schools of innovation?

10 Q. Correct.

11 A. Yes.

12 Q. And she is over White's Creek, correct?

13 A. No.

14 Q. Who is over White's creek?

15 A. Dr. Chae Snorten.

16 Q. So you had three executive directors over
17 the schools of innovation in 2019 and 2020, correct?

18 A. Yes.

19 Q. And you have three current, correct?

20 A. Yes.

21 Q. And you were over White's Creek in 2019,
22 2020, and now you are not over White's Creek,
23 correct?

24 A. Correct.

25 Q. And currently now Ms. Edwards is over

1 White's Creek?

2 A. No.

3 Q. Who?

4 A. Dr. Chae Snorten.

5 Q. Snorten. And so it's the executive
6 directors in the school of innovation that had to
7 have additional specialists, correct?

8 A. Yes.

9 Q. Okay. Now, the executive directors who
10 were not over the school of innovation, did their
11 jobs continue as they had? Did their jobs continue
12 in the 2020, 2021 school year, the same as they had
13 done in the 2019, 2020 school year? Meaning from
14 2019 to 2020, that school year, but they did stay
15 the same in the 2020, 2021 school year?

16 A. I don't know.

17 Q. Did anyone tell you that those jobs were
18 changing?

19 A. No.

20 Q. Do you know Dr. Lily Leffler?

21 A. Yes.

22 Q. Were you aware that she was an executive
23 director?

24 A. Yes.

25 Q. Okay. Did you get along well with Dr.

1 Leffler?

2 A. Yes.

3 Q. Did she ever cause you to complain about
4 her?

5 A. Does what?

6 Q. Did you ever complain about Dr. Leffler to
7 anybody?

8 A. No.

9 Q. Did anybody ever complain to you that Dr.
10 Leffler is difficult to get along with?

11 A. No.

12 Q. Did the executive directors ever get --
13 you're sort of making a face I understand, everybody
14 here understands, but it sounds like you find that
15 allegation to be a little bit preposterous, correct?

16 A. So if I may explain just a little bit. I
17 just -- I just don't understand, but it's okay. I
18 know that there may be a method to your madness, and
19 please don't take that the wrong way. I just don't
20 think or operate like that, and for me within the
21 schools of innovation, I had very little
22 interactions with the other executive directors
23 unless I forged a relationship with them.

24 Q. Did all the executive directors ever meet
25 together?

1 A. Sometimes.

2 Q. When you would meet together, was Dr.
3 Leffler there?

4 A. Yes.

5 Q. In those meetings, did you get along well
6 with her?

7 A. Yes.

8 Q. Did she seem to be knowledgeable to you?

9 A. Yes.

10 Q. Did she seem to be professional?

11 A. Yes.

12 Q. Did she seem to be honest?

13 A. Yes. As far as I could tell, yes.

14 Q. Did you know that she had a relative --
15 when you came to Metro schools, did you know that
16 a -- that there was a person whose name was Moreno
17 Carrasco who worked for Metro schools?

18 A. No.

19 Q. Did you come in when Shawn Joseph was the
20 director of schools?

21 A. Yes.

22 Q. Okay. Did you know that his -- one of his
23 high ranking officials name was Mo Carrasco?

24 A. No.

25 Q. Did you know there was an allegation out

1 there and lawsuits filed that Mo Carrasco had
2 sexually harassed some of the females in central
3 office?

4 A. No.

5 Q. Did you know that there were allegations
6 out there that Lily Leffler was kin to the person
7 who actually sued for retaliation --

8 A. No.

9 Q. -- in a sexually harassed environment?

10 A. No.

11 Q. Did you ever hear any comments asked of
12 the executive directors about whether or not Dr.
13 Leffler could be loyal to Metro schools as a result
14 of her relative's lawsuit against the schools?

15 A. I never knew there was a lawsuit against
16 the school, so...

17 Q. I want to ask you about Dr. Bailey. You
18 were the executive director over Dr. Bailey for the
19 2019, 2020 school year, correct?

20 A. Yes.

21 Q. Before you got there, did you know that he
22 had had to discipline Dr. Battle's brother who was a
23 basketball coach under him?

24 A. Before I got there, no.

25 Q. Did you know that Dr. Bailey had

1 nonrenewed Coach Battle, who was Dr. Battle's
2 brother, for beating up a parent at the end of a
3 basketball game?

4 A. No, not before I got there.

5 Q. After you got there, did you find out
6 about that?

7 A. Dr. Bailey told me about it.

8 Q. What did Dr. Bailey tell you?

9 A. He just told me that there was an incident
10 and that he had to discipline the coach.

11 Q. Did he tell you it was Dr. Battle's
12 brother?

13 A. I don't recall.

14 Q. Did he tell you that Dr. Battle began to
15 act very differently towards him?

16 A. No.

17 Q. Did anyone at Metro schools tell you that
18 there had been complaints made through the hierarchy
19 at Metro schools that Dr. Battle was out to get Dr.
20 Bailey?

21 A. No.

22 Q. Because of his discipline of her brother?

23 A. No.

24 Q. So did anyone at Metro schools make any
25 comment to you at any point in time that there is an

1 issue here, that there's been a complaint made that
2 Dr. Battle was out to get Dr. Bailey, so, you, as
3 executive director need to let Metro schools aware
4 of anything that you think could be retaliatory?

5 A. No.

6 Q. Can you tell me of any protection that
7 Metro schools told you to put in place for Dr.
8 Bailey to protect him from Dr. Battle's retaliation?

9 A. I don't understand the question.

10 Q. Okay. Meaning that --

11 MR. FOX: Objection to the form.

12 BY MS. STEINER:

13 Q. Assuming that there were complaints made
14 through the hierarchy at Metro schools that Dr.
15 Battle has basically said that she's out to get Dr.
16 Bailey because of his treatment of her brother,
17 assuming that those type allegations got as high as
18 Director Shawn Joseph, did anyone, when you came in
19 as executive director, tell you we need to put some
20 precautions, some safety measures in place to make
21 sure that there is no retaliation against Dr.
22 Bailey?

23 MR. FOX: Objection to the form.

24 BY MS. STEINER:

25 Q. Do you know of anything like that that

1 happened?

2 A. I have never heard any of what you have
3 stated ever.

4 Q. Has anyone since -- you're aware that Dr.
5 Bailey is no longer at Metro schools?

6 A. Yes.

7 Q. Are you aware that he sued them for
8 retaliation?

9 A. I received the deposition.

10 Q. Has anyone from Metro schools questioned
11 you to find out whether or not you thought Dr.
12 Bailey was retaliated against Dr. Battle?

13 A. No.

14 Q. Has anyone investigated that? Okay. As
15 an executive director, if there are complaints of
16 retaliation, should they be investigated?

17 A. Say that again.

18 Q. As an executive director, do you know that
19 if there is a complaint of retaliation that occurs,
20 should that be invested?

21 A. Yes.

22 Q. Okay. You are not aware of any
23 investigations of any of Dr. Bailey's complaints of
24 retaliation, correct?

25 A. Not to my knowledge.

1 Q. Okay.

2 A. Not that I can recall.

3 MR. FOX: Objection to the form.

4 BY MS. STEINER:

5 Q. Now, Metro schools, this is kind of a -- I
6 just want to get your opinion on this. It may
7 seem -- what are the kids scored on, is it like zero
8 through four, what's the GPA, is it like a 4.0, does
9 it equate to an A like it did back in my time?

10 A. I don't have it in front of me.

11 Q. Do you know what the grading system is?

12 A. Well, it's on the board policy on the
13 website.

14 Q. What is it?

15 A. It should be on Metro -- the Metro
16 Nashville Public Schools page.

17 Q. Isn't it just the typical 4.0?

18 A. I'm not sure. I don't have it right here
19 in front of me.

20 Q. Look at -- can you go higher than a 4.0?

21 A. I don't know. I mean, there is some
22 schools that have -- I know in Houston, it's on a
23 five-point scale. You know, I think you hear
24 students all the time that have a 4.3. It's a
25 weighted GPA, so...

1 Q. Okay. So you don't know what the GPA
2 system is at Metro schools currently?

3 A. I do know, I just don't have it right here
4 in front of me. I want to be correct when I --

5 Q. Can you look it up real quick and tell me?

6 MR. FOX: Can we take a quick break,
7 five-minute break and let her.

8 MS. STEINER: Okay.

9 (Brief break observed.)

10 BY MS. STEINER:

11 Q. Everyone ready? Ms. Perry?

12 A. Yes, ma'am.

13 MS. STEINER: For the court reporter and
14 for Brook and Jesse, everyone, it looks like Dr.
15 James Bailey has joined us today. Dr. Bailey, are
16 you there?

17 DR. BAILEY: Yes, I'm here.

18 MS. STEINER: Can we see your video?

19 Okay. There you are. Morning.

20 DR. BAILEY: Good morning.

21 BY MS. STEINER:

22 Q. Okay. Ready to go?

23 A. Yes.

24 MR. FOX: We're ready.

25 BY MS. STEINER:

1 Q. Ms. Perry?

2 A. Yes.

3 Q. Did you find the grading system?

4 A. Yes.

5 Q. What is it?

6 A. So on the GPA, unweighted goes to a 4.0.

7 Weighted with honors goes to a 4.5. Weighted with

8 Cambridge Industries certification, et cetera, goes

9 to a 5.0.

10 Q. So it's possible to actually have a 5.0
11 graduating from Metro schools?

12 A. Yes.

13 Q. Okay. If someone says their GPA is 2.5,
14 what does that correspond to you?

15 A. It depends on if it's a weighted honors or
16 if it's an unweighted.

17 Q. Tell me each one, if it's 2.5.

18 A. 2.5 essentially is a C.

19 Q. A C. Is that pretty standard that
20 knowledge that a 2.5 is a C?

21 A. I would say that it's in the board policy.

22 Q. Is that pretty much standard across the
23 board with regard to -- back 20 years ago, were
24 these weighted scores used as much as they are
25 today?

1 A. Twenty years ago, I was an elementary
2 principal, so my -- well 20 years ago, I was
3 teaching in elementary school.

4 Q. Do you know whether or not these weighted
5 scores were used as much back then?

6 A. I do not know.

7 Q. Okay. Do you know Ashford Hughes, by any
8 chance?

9 A. I know that he is our -- he's over
10 diversity, equity and inclusion.

11 Q. Has he had any dealings with you as the
12 executive officer of schools of innovation?

13 A. No, very limited.

14 Q. Has he come into any of your schools
15 throughout the time he has been there?

16 A. Yes. In middle schools, he has.

17 Q. How often would he come to middle school?

18 A. I don't know how often. As I'm not the
19 executive director of middle schools.

20 Q. How many times do you know that he
21 actually came into one of the schools that reports
22 to you?

23 A. I don't know.

24 Q. Now, do you know Pippa Meriwether?

25 A. Yes.

1 Q. And when you were the executive director
2 in the 2019, 2020 school year, who did you report
3 to?

4 A. Who did I report to?

5 Q. Yes.

6 A. Dr. Sharon Griffin.

7 Q. And in the 2020 through 2021 school year,
8 who did you report to?

9 A. Dr. Sharon Griffin.

10 Q. So your reporting structure did not change
11 at all, correct?

12 A. No.

13 Q. Do you have any knowledge of Dr. Pippa
14 Meriwether's job performance?

15 A. No.

16 Q. Do you have any knowledge of Dr. Damon
17 Cathey's job performance?

18 A. No.

19 Q. Did you hear any complaints about either
20 Dr. Meriwether or Dr. Cathey?

21 A. No.

22 Q. Did you know that Dr. Bailey reported to
23 Dr. Meriwether before you got to Metro schools?

24 A. No.

25 Q. What is your current age?

1 A. 48.

2 Q. What is your date of birth?

3 A. July 1, 1973.

4 Q. Now, when you applied for the executive
5 director position in the 2020 through 2021 school
6 year -- let me ask you this. Were you told that you
7 were going to have to reapply for your position?

8 A. Yes.

9 Q. Do you know why you had to reapply for
10 your position?

11 A. I -- no.

12 Q. Did you know that Dr. Lily Leffler was not
13 hired back on as an executive director?

14 A. Not until after everyone was notified.

15 Q. When everyone was notified, did you see
16 that some new people were added in as executive
17 directors?

18 A. At that time, we didn't know who they
19 were.

20 Q. Was there any discussion about why Dr.
21 Leffler was not hired back on as an executive
22 director?

23 A. No.

24 Q. When you applied, did you have to fill out
25 an application?

1 A. Yes.

2 Q. Did you have to go in for an interview?

3 A. Yes.

4 Q. Who did you interview with?

5 A. A panel.

6 Q. Who was on your panel?

7 A. I don't remember.

8 Q. Was Lisa Spencer on your panel?

9 A. I honestly don't remember.

10 Q. Was Chris Barnes on your panel?

11 A. Yes, he was. I know he was.

12 Q. Do you recall anyone else that was on the
13 panel?

14 A. Gosh. I don't remember.

15 Q. After you interviewed, what happened?

16 A. Nothing. I continued doing my job.

17 Q. Did you have -- when you were interviewed
18 by the panel, did you have to go to any other
19 interviews that you remember?

20 A. Yes.

21 Q. What?

22 A. One more.

23 Q. What was that?

24 A. It was an interview with Dr. Battle and
25 Dr. Barnes.

1 Q. How long did that last?

2 A. Gosh. Maybe 45 minutes to an hour.

3 Q. What did they ask you?

4 A. I don't remember.

5 Q. Did any of them keep notes?

6 A. I don't know.

7 Q. Did you know that some of the scores --
8 did you know you were scored in the first panel
9 interview?

10 A. No.

11 Q. Have you heard that some of the scores are
12 missing?

13 A. No. I didn't know we were scored. I know
14 that sounds bad. You know, when you're on the other
15 side of the interview, you assume, you make
16 assumptions, but, no, I don't know for sure. I'm
17 just answering the questions trying to put my best
18 foot forward.

19 Q. Have you ever made any complaint of
20 retaliation against Metro schools --

21 A. No.

22 Q. -- race, sex, age, national origin, have
23 you ever done anything like that?

24 A. No.

25 Q. Have you ever complained that they were

1 doing something that you thought was illegal?

2 A. No.

3 Q. Did you ever engage in any sort of
4 complaint that you thought you would be protected
5 from retaliation under the law?

6 A. I've never engaged in any complaint.

7 Q. Okay. Now, if somebody under you, as a
8 school principal, complained of retaliation or
9 discrimination when you were there as executive
10 director, would you be made aware of that? Should
11 you be made aware of that?

12 A. I would hope so.

13 Q. Do you know of any principal under you who
14 complained of discrimination or retaliation?

15 A. I'm not aware.

16 Q. Do you know Chad High?

17 A. Yes.

18 Q. How did you know him?

19 A. He is an executive director.

20 Q. Did you know him before he became an
21 executive director?

22 A. No.

23 Q. Did he report to you in the reporting
24 structure?

25 A. No.

1 Q. Now, when you became an executive director
2 of Metro schools, were you trained in what you
3 should do as an executive director with regard to
4 policies like how to assist the principals?

5 A. So can you say that again?

6 Q. When you came on as an executive director
7 in the 2019, 2020 school year, did anyone at Metro
8 schools train you ahead of time about how to do your
9 job as executive director?

10 A. Yes.

11 Q. Who?

12 A. Lisa Coons.

13 Q. Lisa who?

14 A. Dr. Lisa Coons.

15 Q. How do you spell her last name?

16 A. C-O-O-N-S.

17 Q. Did she tell you about what to do if
18 you're having issues with regard to a principal and
19 his job performance?

20 A. It wasn't that kind of training. They
21 train you in being an executive director, these are
22 the things that you should do, this is how you
23 should coach, this is how you conduct problems of
24 practices. It was that kind of training.

25 Q. Was there something called an improvement

1 plan?

2 A. Yes.

3 Q. Does the improvement plan extend to
4 principals?

5 A. Yes.

6 Q. And when do you use an improvement plan?

7 A. It is used at the discretion of whoever
8 the supervisor is.

9 Q. Would you have been the supervisor that
10 could use an improvement plan with regard to a
11 principal?

12 A. Would I be on a plan?

13 Q. No. Could you use, could you make the
14 decision to use --

15 A. Yes.

16 Q. -- an improvement plan for a principal?

17 A. Yes.

18 Q. Okay. And why would you decide to use an
19 improvement plan for a principal?

20 A. So I would use an improvement plan for a
21 principal if they were not showing satisfactory or
22 below progress over time.

23 Q. Did you ever use that for any of the
24 principals who reported to you?

25 A. No.

1 Q. And is an improvement plan implemented to
2 try to show the principal areas that could be
3 improved?

4 A. Yes.

5 Q. Is that being done in the hopes that
6 improvement would occur and the principal would go
7 on to be a good principal at Metro schools?

8 A. Yes.

9 Q. Now, are you aware of the -- were there
10 any principals under you that you ever recommended
11 to be fired?

12 A. That I recommended being fired?

13 Q. Yes.

14 A. No. I've never recommended anyone.

15 Q. Have you ever recommended anyone be
16 nonrenewed, their contract?

17 A. I have never recommended anyone to be
18 nonrenewed.

19 Q. Meaning you never recommended Dr. James
20 Bailey be nonrenewed, correct?

21 A. I did not.

22 Q. And you never put Dr. James Bailey on any
23 sort of performance improvement plan, correct?

24 A. I did not.

25 Q. And you did not recommend that he be fired

1 from Metro schools, correct?

2 A. I did not.

3 Q. And you did not recommend that he be
4 transferred from Metro schools, correct?

5 A. I did not.

6 Q. Now, were you aware that in the year of --
7 in the 2019, 2020 school year, you were Dr.
8 Bailey's direct supervisor, correct?

9 A. Yes.

10 Q. And could you tell me some good thing
11 about Dr. Bailey as a principal?

12 A. Yes.

13 Q. What can you tell me?

14 A. He was very coachable, he had begun to get
15 into classrooms and provide feedback to his
16 teachers, he established a sense of community at
17 White's Creek being White's Creek High School
18 graduate.

19 Q. Did the community there like Dr. Bailey?

20 A. Yes.

21 Q. Did you like Dr. Bailey?

22 A. Yes.

23 Q. And is it true that he's actually a very
24 likable individual, correct?

25 A. Yes.

1 Q. And you said he was coachable, did that
2 mean that if you saw anything that you thought he
3 might be doing wrong, you knew you could step in and
4 tell him what to do and he would correct it,
5 correct?

6 A. Yes.

7 Q. He wanted to do what was right, correct?

8 A. Yes.

9 Q. Okay. And did you consider him to be one
10 of the best principals that you oversaw in the 2019,
11 2020 school year?

12 A. He was average.

13 Q. He was what?

14 A. Average.

15 Q. Okay. So he fit in with all the other
16 principals, correct?

17 A. He fit right in the middle.

18 Q. Okay. Now, and were you the person who
19 was responsible for recommending if a principal be
20 put on an improvement plan?

21 A. Yes.

22 Q. Now, for the 2019, 2020 school year, it's
23 my understanding that there wasn't any testing done;
24 am I right? When COVID hit?

25 A. The COVID year, no.

1 Q. And by that, and this is for the record,
2 do you mean, no, there was no testing?

3 A. There was no testing during the COVID
4 year.

5 Q. So then for the 2019, 2020 school year,
6 the kids actually did not even come to class in the
7 spring, correct, of 2020?

8 A. They did not come during the fourth
9 quarter.

10 Q. So there were no grades for that quarter,
11 correct?

12 A. I don't recall.

13 Q. If Dr. Bailey said that no grades were
14 given, would you dispute that?

15 A. I'm not saying I dispute it. I just don't
16 recall if grades were given for that semester or for
17 that quarter, because there was one quarter that was
18 left.

19 Q. Do you recall passing the kids regardless
20 of what happened, no grades for the fourth quarter?

21 A. I don't remember how we came to -- the
22 students that passed, I don't remember. I just
23 don't.

24 Q. Do you recall that there were not any
25 benchmark testing?

1 A. We did --

2 Q. Excuse me?

3 A. We did a benchmark testing. Not in the
4 fourth quarter, we did a benchmark testing in the --
5 right before we went out for COVID.

6 Q. The benchmark is just to try to -- it's
7 like a practice test and then the real test comes
8 later, correct?

9 A. Yes.

10 Q. And some kids could do -- it's possible
11 for the child not to do well on benchmark and to do
12 real well on the actual test or vice versa, correct?

13 A. Or they do -- it mirrors. It is a
14 predictable tool that we use to predict.

15 Q. It's not exact, correct?

16 A. But there is a strong correlation.

17 Q. Do you know what the correlation is, what
18 the State --

19 A. I don't know.

20 Q. Okay. Now, do you recall going to White's
21 Creek with Sharon Griffin to meet with Dr. Bailey in
22 the winter of 2019, 2020 school year?

23 A. I don't remember that far back.

24 Q. Do you recall telling Dr. Bailey, do you
25 recall Dr. Griffin telling Dr. Bailey that White's

1 Creek had showed great improvements and to keep
2 doing what he was doing?

3 A. You know, I saw great improvement. I
4 could have said that.

5 Q. So you did see great improvement in what
6 was going on at White's Creek?

7 A. Yes.

8 Q. Dr. Bailey was a great leader for the
9 students that were at White's Creek, correct?

10 A. He was a good leader.

11 Q. I think the kids related to Dr. Bailey,
12 correct?

13 A. Yes, as far as I could tell they did.

14 Q. And it's my understanding, too, that you
15 gave Dr. Bailey an evaluation for that year,
16 correct?

17 A. Yes.

18 Q. He did pretty good on his evaluation,
19 didn't he?

20 A. Let me look it up.

21 Q. That's the good thing about having
22 computers handy.

23 A. And being web-based.

24 Q. For the 2019, 2020 school year, what was
25 his numerical score?

1 A. For what school year?

2 Q. For the 2019, 2020 school year, what was
3 his score?

4 A. So there was only one midyear evaluation
5 done, and it was a 3.2.

6 Q. Was it a 3.29?

7 A. Yes.

8 Q. And could you tell me what the ranges for
9 those scores are?

10 A. So it goes all the way up to a five.

11 Q. And what is average?

12 A. Three.

13 Q. So he was above average, correct?

14 A. He was average. It was a 3.2.

15 Q. And do you see his score for the 2018,
16 2019 school year?

17 A. Yes.

18 Q. What was that score?

19 A. 3.8.

20 Q. Was it 3.81?

21 A. Yes.

22 Q. Is that a pretty good score?

23 A. Yes.

24 Q. Did anyone contact you to ask you your
25 opinion about whether or not Dr. Bailey should be

1 fired or nonrenewed?

2 A. No.

3 Q. If they had asked you, would you have told
4 them what you've told us today, that he was a good
5 performer?

6 A. I wasn't involved in those conversation.

7 Q. If they had asked you, would you have told
8 them what you've told us under oath today, that he
9 was a good performer?

10 A. Yes.

11 Q. Okay. And would you have told them that
12 he was a good fit for White's Creek?

13 A. Yes.

14 Q. Now, did you know that -- are you familiar
15 with nonrenewing a teacher?

16 A. Nonrenewing of a teacher?

17 Q. Yes.

18 A. Yes.

19 Q. Are you familiar with nonrenewing a
20 principal?

21 A. I've never had to nonrenew a principal.

22 Q. Is the nonrenewal of a teacher, do you
23 know if it follows the same policy and procedure as
24 a nonrenewal of a principal?

25 A. I don't know.

1 Q. Can your contract be nonrenewed?

2 A. Can my contract be nonrenewed?

3 Q. Yes.

4 A. I work at the will of the superintendent.

5 Q. Can your contract be nonrenewed?

6 A. Yes.

7 Q. Are you tenured?

8 A. Not in Metro.

9 Q. Do you have any knowledge about whether or
10 not you can fire a tenured teacher?

11 A. A tenured teacher?

12 Q. Yes.

13 A. There is a process.

14 Q. Are you familiar with that process?

15 A. Yes.

16 Q. What, in your opinion, is that process?

17 A. So the process is, first of all, that
18 the -- there is sufficient documentation that needs
19 to be administered or gathered, conversations,
20 coaching conversations, observations, it's a
21 documentation of that particular teacher's
22 performance over time, coaching and development, and
23 it has to go before the superintendent and then the
24 board.

25 Q. And were you aware that Dr. Bailey was

1 tenured?

2 A. I wasn't aware. I would assume, but I
3 didn't know for sure.

4 Q. And in the year 2019, 2020, you did not
5 have any documentation or coaching or observations
6 that would have justified terminating Dr. James
7 Bailey, correct?

8 A. I did not have -- put him on a plan. I
9 did not -- you know, we did coaching conversations.
10 The only thing that I would say is that, you know,
11 scores over time is a factor for any principal, even
12 for myself. If scores are underperforming year
13 after year after year, again, as a principal,
14 executive director, we work at the will of the
15 superintendent, and we could -- if we are not
16 producing results for our children, then, you know,
17 we...

18 Q. Okay. Now, were you aware that there were
19 priority schools that had been priority schools a
20 lot longer than White's Creek?

21 A. White's Creek, to my knowledge, was the
22 longest-running school in priority.

23 Q. Let me go back.

24 MR. FOX: We can't hear you.

25 MS. STEINER: Hang on a second.

1 BY MS. STEINER:

2 Q. Were you aware that White's Creek had just
3 become priority?

4 A. I don't --

5 MR. FOX: Objection to the form.

6 THE WITNESS: I don't think that is true.
7 What I do know is that White's Creek was the lowest
8 performing school.

9 BY MS. STEINER:

10 Q. Have you -- since you've been at Metro
11 schools, do you know of any principal who's lost
12 their job who was in a priority school?

13 A. Since I have been here?

14 Q. Yes.

15 A. No. I need to retract that. Yes.

16 Q. Who?

17 A. Dr. Robin Allen.

18 Q. What school was he at?

19 A. She. She was at Haynes Middle School.

20 And then one more.

21 Q. Who?

22 A. Dr. LarCulia Woods. (Court reporter asks
23 for clarification.)

24 Q. What school was she at?

25 A. Gra-Mar.

1 Q. How do you know, did you have any input
2 into the decision of getting rid of Ms. Woods or
3 Ms. Allen?

4 A. So they both -- those schools merged with
5 other schools, so they technically lost their jobs.

6 Q. Okay. Those were the ones who -- it
7 wasn't -- the schools were eliminated, the schools
8 actually disappeared.

9 A. The schools were eliminated.

10 Q. So it had nothing to do with the school's
11 being priority, it was just that the schools
12 disappeared?

13 A. Yes.

14 Q. Okay. Now, White's Creek, did you know
15 that from the information that Metro has given us,
16 it was priority from 2018?

17 A. So that was the year that I got here.

18 Q. Okay. Were you aware that some of the
19 schools such as Pearl Cohn was priority from 2014?

20 A. Pearl Cohn got out of priority 2018.

21 Q. Were you aware that Neely's Bend was
22 priority from 2014?

23 A. I wasn't here.

24 Q. Were you aware that Napier had been
25 priority from 2014?

1 A. So all of these schools, when I got here
2 in 2018, were not on the priority list.

3 Q. How many did you have on the priority list
4 in 2018?

5 A. 2018, there were 21 schools.

6 Q. How many high schools?

7 A. Two.

8 Q. Who were those?

9 A. Maplewood and White's Creek.

10 Q. How long had Maplewood been on the
11 priority list?

12 A. That was my first year here.

13 Q. Do you know if the principal at Maplewood
14 continued in their position?

15 A. The principal. When I first got here, is
16 not the same principal that was here when I first
17 got here.

18 Q. Do you have any idea where that principal
19 is and why they left Maplewood?

20 A. That principal -- there is one other
21 principal. Now, you're recalling my memory. So I
22 need to recant what I said. There was one other
23 principal that lost their job, and that would be the
24 principal at Maplewood High School.

25 Q. Who was that?

1 A. Her name was Dr. Keely Webb.

2 Q. And when did she lose her job?

3 A. Ma'am?

4 Q. When did she lose her job?

5 A. It would have been -- I wasn't over high
6 schools, I was a coordinator that year. It was the
7 2018, 2019 school year, because I was not her
8 supervisor. (Court reporter asks for
9 clarification.)

10 Q. Dr. Keely Webb. Not Keely Webb. Keely --
11 that's not her name. Her name is Keely -- give me
12 just two seconds. That is not her name.

13 MR. FOX: Mason?

14 THE WITNESS: Keely Jones-Mason. That's
15 the problem you have when you work in different
16 districts and people have the same name.

17 BY MS. STEINER:

18 Q. Did Ms. Mason move to an assistant
19 principal's position?

20 A. I don't know. I don't know that she was
21 moved or did she apply, I don't know.

22 Q. She ended up in an assistant principal's
23 position, correct?

24 A. Yes.

25 Q. Okay. Now, did anyone talk to you about

1 transferring Dr. Battle to a teaching position?

2 A. No.

3 Q. Did you know that Dr. Bailey did not have
4 a teaching license? He only had an administrative
5 license; did you know that?

6 A. No.

7 Q. If you were the executive director over a
8 school, can they hire a teacher who only has an
9 administrative license?

10 A. Can they hire a teacher who only hires --

11 Q. Who only has his administration license,
12 does not have a teaching license?

13 A. To do what role?

14 Q. Be a teacher.

15 A. If you are a teacher, you have to have a
16 certified license or be in a program.

17 Q. What type of program?

18 A. A teacher ED program.

19 Q. And how do you get into a teacher ED
20 program?

21 A. Enroll in a college program.

22 Q. Does it have to be approved by Metro?

23 A. Approval, no. Approved by TDOE.

24 Tennessee Department of Education. The licensing
25 goes through the Tennessee Department of Education.

1 Q. Do most of the teachers that teach in
2 Metro schools have teaching licenses?

3 A. They have teaching licenses or permits
4 or -- with permits, meaning they are enrolled in a
5 teacher ED program.

6 Q. Were you aware that Dr. Bailey -- that
7 Chris Barnes said he could not hire Dr. Bailey as a
8 teacher because he didn't have a -- he could not
9 transfer Dr. Bailey into a teaching position because
10 he didn't have a teaching license?

11 A. I was not aware of that.

12 Q. What was your understanding of what
13 happened to Dr. Bailey?

14 A. I -- my understanding is that he was no
15 longer going to be the principal at White's Creek
16 High School.

17 Q. Why?

18 A. I never asked why. I never was told why.

19 Q. What was your understanding about how he
20 was no longer at Metro schools?

21 A. My understanding is data over time, that
22 the school was not performing in a rapid manner,
23 like the student outcomes were not performing at a
24 high rate. The previous year, there was
25 zero percent of students who were mastered on the

1 State standardized test.

2 Q. Let me ask you that. Who told you that,
3 and when did they tell you what? Who told you?

4 A. I knew that, that the school was
5 zero percent when I took on the school at the
6 beginning of the year.

7 Q. Who told you that that had anything to do
8 with Dr. Bailey losing his job?

9 A. No one did.

10 Q. Have you talked to Dr. Battle about what
11 happened to Dr. Bailey?

12 A. No.

13 Q. Okay. Do you miss having Dr. Bailey there
14 as principal?

15 A. I want to do what is right for the school.

16 Q. Do you miss Dr. Bailey?

17 A. Dr. Bailey was a good principal.

18 MR. FOX: Objection to the form.

19 THE WITNESS: Thank you.

20 BY MS. STEINER:

21 Q. Now, did anyone from Metro schools make
22 any statements to you about nonrenewing Dr. Bailey's
23 contract?

24 A. No.

25 Q. Did anyone at Metro schools make any

1 comment to you about transferring Dr. Bailey?

2 A. No.

3 Q. I'd like to show you something.

4 MS. STEINER: May I share, Jesse?

5 BY MS. STEINER:

6 Q. Okay. Do you see this letter that's dated
7 May 6, 2020?

8 A. Uh-huh. Yes.

9 Q. Okay. Do you remember typing this? Did
10 you type this or did you dictate it out?

11 A. I typed it.

12 Q. Did you? Do you recall typing this letter
13 to Dr. Bailey?

14 A. Yes.

15 Q. Is everything in it true? Tell me if you
16 want me to move up or down.

17 A. Go up. I mean, down. I'm sorry. Yes.

18 Q. Can we have this marked as Exhibit Number
19 1 to your deposition today.

20 (WHEREUPON, the
21 previously-mentioned document was
22 marked as Exhibit Number 1.)

23 MR. FOX: No objection.

24 THE WITNESS: The only -- I see a mistake,
25 though. I only -- I supervised him for the 2019,

1 2020 school year. 2018, 2019 school year, I was the
2 coordinator of instructional support.

3 BY MS. STEINER:

4 Q. As a coordinator, were you still over
5 White's Creek?

6 A. No. I was not over White's Creek.
7 Coordinator means I provide professional development
8 and professional learning.

9 Q. Okay.

10 MS. STEINER: Can we go off the record
11 about ten minutes; is that okay? Let me ask you two
12 more questions before we go off the record.

13 BY MS. STEINER:

14 Q. Are you certified?

15 A. Yes.

16 Q. And are you tenured?

17 A. Not in Nashville.

18 Q. Okay.

19 MS. STEINER: Let's go off the record for
20 just about ten minutes and then we'll be back, okay?
21 Thank you.

22 MR. FOX: Okay. Taking a break.

23 (Brief break observed.)

24 BY MS. STEINER:

25 Q. Ms. Perry, you were Dr. Bailey's direct

1 supervisor for the 2019, 2020 school year, correct?

2 A. Yes.

3 Q. And for that school year, the kids did not
4 have to -- they did not, they were not capable of
5 undergoing their normal testing for achievement,
6 correct?

7 A. Yes.

8 Q. And did Dr. Griffin have any discussions
9 with you about whether or not she knew or she did
10 not know that Dr. Bailey was being nonrenewed?

11 A. Sorry, could you repeat that?

12 Q. Did Dr. Griffin have any discussions with
13 you about whether or not she knew or she did not
14 know that Dr. Bailey was being nonrenewed?

15 A. Dr. Griffin had no discussions with me.

16 Q. And if you could not do testings for the
17 schools that year, if Dr. Bailey tells me, that
18 means you really don't have an exact idea where the
19 kids were going to be and whether or not the school
20 was going to be priority for that year, would you
21 agree with that?

22 A. We have our testing that we get throughout
23 the year, the benchmark data that would have given
24 us a clear predictor of where the kids were by the
25 end of the year.

1 Q. Do you recall going to principal of the
2 year award with Dr. Bailey in Murfreesboro?

3 A. Yes.

4 Q. And could you explain to me what that was?

5 A. He told me that he was principal of the
6 year, that he did not know how he got it and asked
7 me if I would go with him, and I said yes.

8 Q. And who gave him that award?

9 A. It was the Middle Tennessee Principal's
10 Association. I -- yes. It was -- yes.

11 Q. Did you go with him to get that award?

12 A. I went with him.

13 Q. Was that for the 2019, 2020 school year?

14 A. No. It would have been for -- I don't
15 know what school year it was for, because he
16 received it 2019, so it would have been based off of
17 previous work.

18 Q. Was that an honor?

19 A. It's always an honor when you're principal
20 of the year.

21 Q. Was it principal of the year for the
22 middle portion of Tennessee or for the whole state?

23 A. It was for -- I know the conference was
24 for middle Tennessee.

25 Q. And how many counties are in middle

1 Tennessee; do you know?

2 A. I don't know.

3 Q. Do you know if that included like
4 Williamson, Rutherford, Davidson, Cheatham,
5 Montgomery?

6 A. I would assume so.

7 Q. And where was it held?

8 A. Where?

9 Q. Do you know where you went?

10 A. Went to Murfreesboro.

11 Q. Where in Murfreesboro?

12 A. It was at a hotel, I think.

13 Q. Like --

14 A. In a hotel, yes.

15 Q. And did you stand up and say anything?

16 A. Yes.

17 Q. Did you tell them what a great principal
18 he was?

19 A. I told them -- yes. I was proud of him
20 for being honored as principal of the year.

21 Q. That is it. Thank you very much, Ms.
22 Perry.

23 A. Okay.

24 MS. HARBISON: Nothing from me.

25 MR. FOX: No questions from Metro.

1 MS. STEINER: Thank you.

2 FURTHER THIS DEPONENT SAITH NOT

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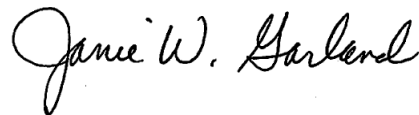
REPORTER'S CERTIFICATION

STATE OF TENNESSEE)
COUNTY OF DAVIDSON)

I, Janie W. Garland, LCR#111, licensed court reporter, in and for the State of Tennessee do hereby certify that the above deposition was reported by me via remote means and that the foregoing pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number following my name below.



Janie W. Garland, LCR#111

E R R A T A P A G E

I, Renita Perry, having read the foregoing deposition, Pages 1 through 65, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

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Renita Perry

BY MS. STEINER: [14] 30/12 30/24 32/4 33/10 33/21 33/25 53/1 53/9 56/17 59/20 60/5 61/3 61/13 61/24 DR. BAILEY: [2] 33/17 33/20 MR. FOX: [12] 30/11 30/23 32/3 33/6 33/24 52/24 53/5 56/13 59/18 60/23 61/22 64/25 MS. HARBISON: [1] 64/24 MS. STEINER: [8] 33/8 33/13 33/18 52/25 60/4 61/10 61/19 65/1 THE WITNESS: [4] 53/6 56/14 59/19 60/24	3.81 [1] 49/20 3119 [1] 5/11 340M [1] 2/9 37201 [1] 2/9 37206 [2] 3/13 3/19 37219 [1] 3/24 37221 [1] 5/12 3:20-CV-01023 [1] 1/5	ahead [2] 20/15 41/8 all [13] 3/3 3/4 7/25 18/16 20/10 21/22 26/24 32/24 36/11 45/15 49/10 51/17 55/1 allegation [2] 26/15 27/25 allegations [2] 28/5 30/17 Allen [2] 53/17 54/3 along [3] 25/25 26/10 27/5 also [4] 8/15 21/6 21/7 21/9 always [2] 22/9 63/19 am [5] 10/20 45/24 66/13 66/15 66/18 amount [1] 19/25 Ann [2] 3/11 8/3 announce [1] 7/23 announced [2] 6/21 7/20 another [1] 13/7 answer [1] 8/22 answering [1] 39/17 any [45] 8/9 11/7 11/13 11/19 12/4 18/10 20/17 28/11 29/24 29/25 30/6 31/2 31/22 31/23 35/7 35/11 35/14 36/13 36/16 36/19 37/20 38/18 39/5 39/19 40/3 40/6 40/13 42/23 43/10 43/22 45/23 46/24 51/9 52/5 52/11 53/11 54/1 55/18 59/22 59/25 62/8 62/12 66/14 66/15 67/5 anybody [2] 26/7 26/9 anyone [16] 25/17 29/17 29/24 30/18 31/4 31/10 31/14 38/12 41/7 43/14 43/15 43/17 49/24 56/25 59/21 59/25 anything [6] 30/4 30/25 39/23 45/2 59/7 64/15 APPEARANCES [1] 3/7 application [1] 37/25 applied [2] 37/4 37/24 apply [2] 10/5 56/21 Approval [1] 57/23 approved [2] 57/22 57/23 April [2] 1/24 3/2 are [38] 3/4 3/5 8/6 10/9 11/21 12/11 15/8 15/11 16/3 19/3 20/20 20/22 20/23 20/25 22/3 24/22 31/7 31/15 31/22 32/7 33/15 33/19 34/24 39/11 41/21 43/9 49/9 50/14 50/19 51/7 51/14 52/12 52/15 57/15 58/4 61/14 61/16 63/25 areas [1] 43/2 as [55] 3/3 3/4 5/2 5/3 6/6 6/6 10/18 12/3 15/1 15/13 16/22 17/10 17/10 18/14 18/21 19/9 20/24 25/11 25/12 27/13 27/13 28/13 30/2 30/17 30/17 30/19 31/14 31/18 34/24 34/24 35/5 35/11 35/18 37/13 37/16 37/21 40/7 40/9 41/3 41/6 41/9 44/11 48/13 48/13 50/23 52/13 54/19 58/7 59/14 60/18 60/22 61/4 64/20 66/19 66/20 Ashford [1] 35/7 ask [9] 7/5 8/21 9/3 28/17 37/6 39/3 49/24 59/2 61/11 asked [5] 28/11 50/3 50/7 58/18 63/6 asking [1] 9/6 asks [2] 53/22 56/8 assist [1] 41/4 assistant [3] 13/18 56/18 56/22 Associates [1] 2/8 Association [1] 63/10 assume [6] 6/17 7/21 12/18 39/15 52/2 64/6 assuming [2] 30/13 30/17 assumptions [1] 39/16
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